

EXHIBIT 24

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

-----X
STUDENTS FOR FAIR ADMISSIONS, INC.,)
)
Plaintiff,)
) Civ. No.
vs.) 14-cv-14176-
) (ADS)
PRESIDENT AND FELLOWS OF HARVARD)
COLLEGE (HARVARD CORPORATION),)
)
Defendant.)
-----X

July 27, 2017

1:00 p.m.

DEPOSITION OF [REDACTED], taken by
Defendant, held at the offices of Wilmer Cutler
Pickering Hale and Dorr LLP, 7 World Trade Center,
New York, New York, pursuant to Subpoena, before by
Mayleen Ahmed, a Registered Merit Reporter,
Certified Realtime Reporter, Washington Certified
Court Reporter, and Notary Public of the State of
New York.

1 leadership at SFFA.

2 MR. PARK: I'm going to instruct the
3 witness not to answer that with respect to the
4 governance issue, as before.

5 Q. Okay. Did you personally vote to elect
6 any Board member of SFFA?

7 MR. PARKS: Objection.

8 Q. Setting aside the structural question.

9 MR. PARKS: Objection. That's first
10 amendment privilege. Or instruction not to
11 answer, technically.

12 MR. WINIK: Okay. We disagree with the
13 objection. We can move on.

14 Q. Do you know who the treasurer of SFFA is?

15 MR. PARK: You can answer.

16 A. I don't know who the treasurer is.

17 Q. Do you know who the secretary of SFFA is?

18 A. I don't know who that is either.

19 Q. Do you know who the president of SFFA is?

20 MR. PARKS: Objection.

21 A. I think it's Mr. Edward Blum.

22 Q. Have you ever spoken to Richard Fisher?

23 A. No, I don't think so.

24 Q. Did you ever communicate with him, by

1 email or otherwise?

2 A. No.

3 Q. How about Abigail Fisher?

4 A. No.

5 Q. Do you know who's responsible for the
6 day-to-day operations of SFFA?

7 MR. PARKS: Objection.

8 A. No.

9 Q. You said earlier that you hadn't attended
10 a conference call with SFFA. Have you ever
11 attended an in-person meeting?

12 A. With who?

13 Q. With other SFFA members.

14 A. No.

15 Q. Do you know if SFFA has ever held an
16 in-person meeting with the members?

17 A. I don't know if they have.

18 MR. WINIK: Could you mark that as
19 exhibit 3, please?

20 [REDACTED] Exhibit 3, 6/30/15 letter re:
21 Annual report of Students for Fair Admissions,
22 SFFA-Harvard 0000119-122, marked for
23 identification, as of this date.)

24 Q. Take a moment to look at that document.

1 Q. Does that affect your answer about
2 whether you would apply to transfer to Harvard if
3 Harvard were to cease the consideration of race in
4 admissions?

5 MR. PARKS: Objection. And I'll also
6 just repeat my objection to the document,
7 although I note what you represent it to be.
8 You can answer.

9 A. Could you repeat the question?

10 Q. I just read to you a document saying --

11 A. Uh-hmm.

12 Q. -- that to be eligible to transfer to
13 Harvard, a student cannot have completed more than
14 two years of college at another institution.

15 A. Uh-hmm.

16 Q. You completed one year at [REDACTED]?

17 A. Right.

18 Q. Does this policy change the answer you
19 gave me about whether you would apply to transfer
20 to Harvard if Harvard were to stop considering
21 race?

22 MR. PARKS: Objection.

23 A. If Harvard were to cease the
24 consideration of race, I would still apply for

1 transfer.

2 Q. Are you planning to go to [REDACTED] next year?

3 A. Yes.

4 Q. Have you thought about taking a leave of
5 absence from [REDACTED]?

6 MR. PARKS: Objection.

7 A. No.

8 Q. So if two years from now Harvard ceases
9 the consideration of race, would you apply to
10 transfer to Harvard?

11 MR. PARKS: Objection.

12 (Witness reviewing document.)

13 A. If I'm no longer eligible for transfer
14 admission, then I would not apply to transfer, I
15 guess.

16 Q. Okay. Do you know what concentration you
17 would pursue if you were to transfer to Harvard?
18 Sorry.

19 MR. PARKS: Objection.

20 Q. I should say, concentration is what
21 Harvard calls a major, if that makes it clear.

22 MR. PARKS: Objection.

23 A. If I were to be a student at Harvard, I
24 think I would pursue a concentration of economics.

